

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

SANDRA CARRASQUILLO VEGA

DEBTOR

\*

\*

\*

\*

CASE NO. 09-07281-SEK

CHAPTER 13

\*\*\*\*\*

**MOTION AND NOTICE OF FILING OF POST-CONFIRMATION  
MODIFICATION OF CHAPTER 13 PLAN**

TO THE HONORABLE COURT:

NOW COMES, **SANDRA CARRASQUILLO VEGA**, through the undersigned attorney, and very respectfully states and prays as follows:

1. Debtor is hereby submitting a Post-confirmation Modification of Chapter 13 Plan, dated April 28, 2010, herewith and attached to this motion.

2. This Post-confirmation Modification Plan is filed to clarify the information of tax refunds.

**NOTICE TO CREDITORS AND PARTIES IN INTEREST**

NOTICE IS HEREBY GIVEN, that debtor proposed post-confirmation Plan is hereby circulated to all creditors and parties in interest. You are hereby notify that you have twenty (20) days to reject the proposed modification of this Plan and request a hearing.

I **CERTIFY** that on this same date a copy of this notice was sent by the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants and debtor, Sandra Carrasquillo Vega; and to all creditors and parties in interest in the present case.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 28<sup>th</sup> day of April, 2010.

/s/ Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
ATTORNEYS FOR PETITIONER  
PO BOX 193677  
San Juan PR 00919-3677  
TEL NO (787) 744-7699 FAX 746-5294  
Email: rfigueroa@prtc.net

United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. 09-07281-13CARRASQUILLO VEGA, SANDRAChapter 13

Debtor(s)

## CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: <u>4/28/2010</u> <input type="checkbox"/> AMENDED PLAN DATED: _____ <input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<b>I. PAYMENT PLAN SCHEDULE</b>  \$ <u>200.00</u> x <u>60</u> = \$ <u>12,000.00</u> \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____  TOTAL: \$ <u>12,000.00</u>  Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:  <input type="checkbox"/> Sale of Property identified as follows: _____  <input type="checkbox"/> Other: _____  Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____  PROPOSED BASE: \$ <u>12,000.00</u>  <b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)  Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,854.00</u>  Signed: <u>/s/ SANDRA CARRASQUILLO VEGA</u> Debtor  _____ Joint Debtor	<b>II. DISBURSEMENT SCHEDULE</b>  A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input type="checkbox"/> Trustee pays secured ARREARS: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. <u>MUEBLERIA BERRIC</u> Cr. _____ Cr. _____ # <u>2306258401</u> # _____ # _____ \$ <u>1,376.25</u> \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:  5. <input type="checkbox"/> Other:  6. <input type="checkbox"/> Debtor otherwise maintains regular payments directly to:  C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.  <b>OTHER PROVISIONS:</b> ( <i>Executory contracts; payment of interest to unsecureds, etc.</i> ) * "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds." Any tax refunds received during the term of the Plan shall be paid into the plan as a additional payment. Debtor(s) to provide ADEQUATE PROTECTION PAYMENTS to MUEBLERIA BERRIOS thru the Trustee in the sum \$20.00 per month for the next eight months or until confirmation. *Or as otherwise specified on proof of claim. Late filed claims filed by creditors will receive no distribution. "Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank. Debtor reserves the right to object claims after plan confirmation.

Attorney for Debtor R. Figueroa Carrasquillo Law OfficePhone: (787) 744-7699

**CARRASQUILLO VEGA, SANDRA**  
**PO BOX 9761**  
**CIDRA, PR 00739**

**R. Figueroa Carrasquillo**  
**Law Office**  
**PO Box 193677**  
**San Juan, PR 00919-3677**

**BANCO POPULAR DE PR**  
**PO BOX 362708**  
**SAN JUAN, PR 00936-2708**

**BANCO POPULAR DE PR**  
**PO BOX 70100**  
**SAN JUAN, PR 00936-8100**

**CITIFINANCIAL PLUS**  
**PO BOX 499**  
**HANOVER, MD 21076**

**COOP A/C SAN JOSE**  
**PO BOX 2020**  
**AIBONITO, PR 00705**

**MUEBLERIA BERRIOS**  
**PO BOX 674**  
**CIDRA, PR 00739-0674**

**PEP BOYS**  
**BANK ONE 1802**  
**DAYTON, OH 45401-1802**

**T-MOBILE**  
**PO BOX 742596**  
**CINCINNATI, OH 45274-2596**